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August 13, 2025

VIA ECF

Hon. Tonianne J. Bongiovanni, U.S.M.J.
Clarkson S. Fisher Federal Building
and U.S. Courthouse
402 E. State Street
Trenton, New Jersey 08608

Re: UMG Recordings, Inc. et al. v. RCN Telecom Services, LLC et al.
Civil Action No. 19-17272 (MAS) (TJB)

Dear Judge Bongiovanni:

Together with the firms of Steptoe LLP and Stein Mitchell Beato & Missner LLP, we represent Plaintiffs and Counterclaim-Defendant Recording Industry Association of America, Inc. (“RIAA”) in this action. We submit this letter, with the consent of counsel for Defendants, to request a 10-day extension of the August 15, 2025 deadline set forth in the Court’s July 24, 2025 Text Order (D.E. 303) for Defendants to resubmit their privilege log and identify cases that support the conclusion that the documents withheld in Category 1, *i.e.*, those on which no attorney is listed as the sender, recipient, cc, or in any other fashion, can appropriately be withheld based on the attorney-client privilege (from August 15, 2025 to August 25, 2025).

As Your Honor may know, Steptoe LLP replaced Jenner & Block LLP as co-counsel for Plaintiffs in the end of July. The brief requested extension will provide additional time for the parties to meaningfully participate in and continue the meet and confer process contemplated by the Text Order.

We have included a proposed “So Ordered” line at the end of this letter in the hope that this proposal is acceptable to the Court.

Respectfully submitted,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

s/ Kathleen N. Fennelly

KATHLEEN N. FENNELLY

cc: All counsel (via ECF and e-mail)

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Hon. Tonianne J. Bongiovanni, U.S.M.J.
August 13, 2025
Page 2

SO ORDERED this ____ day of August, 2025.

HON. TONIANNE J. BONGIOVANNI
United States Magistrate Judge